

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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D.V.D., <i>et al.</i> ,	)	
	)	
	)	
Individually and on behalf of all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	No. 1:25-cv-10676-BEM
	)	
v.	)	
	)	
U.S. Department of Homeland Security, <i>et al.</i> ,)	)	
	)	
Defendants.	)	
	)	
	)	

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**UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO FILE DISCOVERY MOTIONS**

On May 7, 2025, this Court ordered expedited discovery on, *inter alia*, the “removal of the four alleged class members identified in Defendants’ April 23, 2025 response (Dkt. 72) that occurred after the issuance of this Court’s temporary restraining order.” ECF No. 92. The Court also ordered that “any objection, motion to quash, or motion for a protective order must be made within fourteen days of receipt of the discovery request or subpoena.” *Id.* Due to the events that occurred during the week of May 19, 2025, which consumed much of the Parties’ and this Court’s time, Defendants respectfully request that the Court extend their deadline until Friday, May 30, 2025. This extension will allow the parties to more meaningfully confer regarding such discovery motions. Undersigned counsel contacted counsel for Plaintiffs who indicated, via email, that they do not oppose this motion.

Respectfully submitted,

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